

IN THE UNITED STATES DISTRICT  
COURT FOR THE EASTERN DISTRICT OF  
MISSOURI

**DEFENDANT TRISTAR COMPANIES, LLC'S RESPONSES TO AXIS SURPLUS  
INSURANCE COMPANY'S REQUESTS TO ADMIT**

Defendant TriStar Companies, LLC (“Tristar”), by and through the undersigned counsel, and for its Answers and Objections to Axis Surplus Insurance Company’s Request to Admit, states as follows:

**GENERAL OBJECTION:** TriStar objects to the inclusion in the definition of “You”, “Your”, “TriStar” and “Defendant” of TriStar Properties, LLC. TriStar Properties, LLC, including whoever is its officers, directors, employees, owners, agents, representatives, successors, assigns, and other persons acting on its behalf have no relationship to TriStar and TriStar has no knowledge of this entity and cannot answer on its behalf.

## **REQUESTS TO ADMIT**

**REQUEST TO ADMIT NO. 1:** Admit that the address or location of the Amazon “delivery station” named as “DLI4” in the Edwardsville Tornado Actions is not identified anywhere in the AXIS Policy.

**RESPONSE:** Denied.

**REQUEST TO ADMIT NO. 2:** Admit that the address or location of the Amazon “delivery station” named as “DLI4” in the Edwardsville Tornado Actions is not identified in Form SI 112 (09-15) (“Schedule of Locations”) of the AXIS Policy.

**RESPONSE:** Denied.

**REQUEST TO ADMIT NO. 3:** Admit that the address or location of the Amazon “delivery station” named as “DLI4” in the Edwardsville Tornado Actions is not identified in “Policy Change Number 1” (Form IL 12 01 11 85) of the AXIS Policy.

**RESPONSE:** Denied.

**REQUEST TO ADMIT NO. 4:** Admit that the address or location of the Amazon “delivery station” named as “DLI4” in the Edwardsville Tornado Actions is not identified in “Policy Change Number 2” (Form IL 12 01 11 85) of the AXIS Policy.

**RESPONSE:** Admit.

**REQUEST TO ADMIT NO. 5:** Admit that the address or location of the Amazon “delivery station” named as “DLI4” in the Edwardsville Tornado Actions is not identified in “Policy Change Number 3” (Form IL 12 01 11 85) of the AXIS Policy.

**RESPONSE:** Admit.

**REQUEST TO ADMIT NO. 6:** Admit that the address or location of the Amazon “delivery station” named as “DLI4” in the Edwardsville Tornado Actions is not identified in “Policy Change Number 4” (Form IL 12 01 11 85) of the AXIS Policy.

**RESPONSE:** Admit.

**REQUEST TO ADMIT NO. 7:** Admit that the address or location of the Amazon “delivery station” named as “DLI4” in the Edwardsville Tornado Actions is not identified in “Policy Change Number 5” (Form IL 12 01 11 85) of the AXIS Policy.

**RESPONSE:** Admit.

**REQUEST TO ADMIT NO. 8:** Admit that the address or location of the Amazon “delivery station” named as “DLI4” in the Edwardsville Tornado Actions is not identified in “Policy Change Number 6” (Form IL 12 01 11 85) of the AXIS Policy.

**RESPONSE:** Admit.

**REQUEST TO ADMIT NO. 9:** Admit that the address or location of the Amazon “delivery station” named as “DLI4” in the Edwardsville Tornado Actions is not identified in “Policy Change Number 7” (Form IL 12 01 11 85) of the AXIS Policy.

**RESPONSE:** Admit.

**REQUEST TO ADMIT NO. 10:** Admit that the address of the facility named as “DLI4” in the Edwardsville Tornado Actions is 3077 Gateway Commerce Center Dr. S, Edwardsville, Illinois 62025.

**RESPONSE:** Denied.

**REQUEST TO ADMIT 11:** Admit that “Location #17” referenced in the AXIS Policy (Policy Change Number 1), described as “E-1255, W. Sand Rd., N. 1-270, S. Hwy 270-255 + Hwy 111, Edwardsville IL 62025,” does not contain the facility or building identified as “DLI4” in the Edwardsville Tornado Actions.

**RESPONSE:** Denied.

**REQUEST TO ADMIT 12:** Admit that TriStar itself, or through a joint venture in which it participated, designed the building located at 3077 Gateway Commerce Center Dr. S, Edwardsville, Illinois 62025.

**RESPONSE:** Denied.

**REQUEST TO ADMIT 13:** Admit that TriStar itself, or through a joint venture in which it participated, prepared the site for the building located at 3077 Gateway Commerce Center Dr. S. Edwardsville, Illinois 62025.

**RESPONSE:** Denied.

**REQUEST TO ADMIT 14:** Admit that TriStar itself, or through a joint venture in which it participated, contracted to construct and did construct the building located at 3077 Gateway Commerce Center Dr. S. Edwardsville, Illinois 62025.

**RESPONSE:** Denied.

**REQUEST TO ADMIT 15:** Admit that TriStar itself, or through a joint venture in which it participated, marketed the building located at 3077 Gateway Commerce Center Dr. S. Edwardsville, Illinois 62025.

**RESPONSE:** Denied.

**REQUEST TO ADMIT 16:** Admit that TriStar itself, or through a joint venture in which it participated, sold or participated in the sale of the building located at 3077 Gateway Commerce Center Dr. S. Edwardsville, Illinois 62025.

**RESPONSE:** Denied.

**REQUEST TO ADMIT 17:** Admit that on December 10, 2021, TriStar did not own or rent 3077 Gateway Commerce Center Dr. S, Edwardsville, Illinois 62025.

**RESPONSE:** Admit.

**REQUEST TO ADMIT 18:** Admit that construction of the building located at 3077 Gateway Commerce Center Dr. S, Edwardsville, Illinois, had been completed prior to January 1, 2021.

**RESPONSE:** Objection. TriStar objects to this Request as vague and ambiguous as to what construction is being referenced.

**REQUEST TO ADMIT 19:** Admit that entities conducting business at 3077 Gateway Commerce Center Dr. S, Edwardsville, Illinois took possession of the facility prior to January 1, 2021.

**RESPONSE:** Objection. TriStar objects to this Request as vague and ambiguous as to what business is being referenced.

**REQUEST TO ADMIT 20:** Admit that the “delivery station” identified as “DLI4” in the Edwardsville Tornado Actions is not a residential building.

**RESPONSE:** TriStar is without sufficient information to form a belief as to this Request.

Respectfully submitted,

**BLITZ, BARDGETT & DEUTSCH, LC**

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